

THE HONORABLE BARBARA J. ROTHSTEIN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

MARTIN LUTHER KING, JR.
COUNTY, et al.

Plaintiffs,

v.

SCOTT TURNER in his official capacity
as Secretary of the U.S. Department of
Housing and Urban Development, et al.

Defendant.

No. 2:25-cv-00814-BJR

PLAINTIFFS' UNOPPOSED
MOTION TO SUPPLEMENT THE
RECORD

Plaintiffs respectfully move to supplement the record with evidence in support of their Motion for Preliminary Injunction (Motion). This supplemental evidence was not available until May 19, 2025, three days after Plaintiffs filed their reply in support of the Motion on May 16.

The first piece of evidence Plaintiffs seek to submit is a Memorandum from the Deputy Attorney General to members of the United States Department of Justice (DOJ) announcing a "Civil Rights Fraud Initiative" which "will utilize the False Claims Act to investigate, and as appropriate, pursue claims against any recipient of federal funds that knowingly violates federal civil rights laws." Lawrence Decl., Ex. A. The second piece of evidence is a Declaration of Richard Johns noting that New York City received for signature a Continuum of Care (CoC) grant agreement from the U.S. Department of Housing and Urban Development (HUD) which includes

PLAINTIFFS' UNOPPOSED MOTION TO
SUPPLEMENT THE RECORD - 1
No. 2:25-cv-00814-BJR

PACIFICA LAW GROUP LLP
401 UNION STREET
SUITE 1600
SEATTLE, WASHINGTON 98101-2668
TELEPHONE: (206) 245-1700
FACSIMILE: (206) 245-1750

1 the new and unlawful conditions barred by the Temporary Restraining Order (TRO) this Court
 2 entered on May 7, 2025, Dkt. #52. Correspondence from HUD did not mention the TRO or this
 3 ongoing lawsuit. Johns Decl. ¶ 4.

4 Counsel for Plaintiffs contacted Defendants' counsel regarding their position on the instant
 5 Motion to Supplement the Record. Defendants' counsel responded that they do not object to the
 6 motion.
 7

8 Plaintiffs respectfully request that this Court grant its Motion to Supplement the Record.

9
 10 *I certify that this memorandum contains 223 words, in compliance with the Local Civil
 Rules.*

11 DATED this 20th day of May, 2025.

12 LEESA MANION
 13 King County Prosecuting Attorney

14 /s/ David J. Hackett
 15 David J. Hackett, WSBA #21234
 16 General Counsel to Executive
 17 Alison Holcomb, WSBA #23303
 18 Deputy General Counsel to Executive
 19 Erin Overbey, WSBA #21907
 20 Senior Deputy Prosecuting Attorney
 21 Cristy Craig, WSBA #27451
 22 Senior Deputy Prosecuting Attorney
 23 Donna Bond, WSBA #36177
 24 Senior Deputy Prosecuting Attorney

25 Chinook Building
 26 401 5th Avenue, Suite 800
 27 Seattle, WA 98104
 (206) 477-9483
 david.hackett@kingcounty.gov
 aholcomb@kingcounty.gov
 eroverbey@kingcounty.gov
 cristy.craig@kingcounty.gov
 donna.bond@kingcounty.gov

*Attorneys for Plaintiffs Martin Luther
 King, Jr. County*

PACIFICA LAW GROUP LLP

/s/ Paul J. Lawrence

Paul J. Lawrence, WSBA #13557

Jamie Lisagor, WSBA #39946

Sarah S. Washburn, WSBA #44418

Meha Goyal, WSBA #56058

Luther Reed-Caulkins, WSBA #62513

Special Deputy Prosecutors

PACIFICA LAW GROUP LLP

401 Union Street, Suite 1600

Seattle, WA 98101

T: 206-245-1700

F: 206-245-1750

Paul.Lawrence@PacificaLawGroup.com

Jamie.Lisagor@PacificaLawGroup.com

Sarah.Washburn@PacificaLawGroup.com

Meha.Goyal@PacificaLawGroup.com

Luther.Reed-Caulkins@PacificaLawGroup.com

*Attorneys for Plaintiffs Martin Luther King, Jr.
County, Pierce County, Snohomish County,
County and City of San Francisco, County of
Santa Clara, City of Boston, and City of New
York*

JASON J. CUMMINGS

Snohomish County Prosecuting Attorney

/s/ Bridget E. Casey

Bridget E. Casey, WSBA #30459

Rebecca J. Guadamud, WSBA #39718

Rebecca E. Wendling, WSBA #35887

Snohomish County Prosecuting Attorney's Office

3000 Rockefeller Avenue, M/S 504

Everett, WA 98201-4046

(425) 388-6392

Bridget.Casey@co.snohomish.wa.us

Rebecca.Guadamud@co.snohomish.wa.us

Rebecca.Wendling@co.snohomish.wa.us

Attorneys for Plaintiff Snohomish County

DAVID CHIU
San Francisco City Attorney

/s/ David Chiu

David Chiu (CA Bar No. 189542)
San Francisco City Attorney
Yvonne R. Meré (CA Bar No. 175394)
Chief Deputy City Attorney
Mollie M. Lee (CA Bar No. 251404)
Chief of Strategic Advocacy
Sara J. Eisenberg (CA Bar No. 269303)
Chief of Complex and Affirmative Litigation
Ronald H. Lee (CA Bar No. 238720)
Alexander J. Holtzman (CA Bar No. 311813)
Deputy City Attorneys
1390 Market Street, 7th Floor
San Francisco, CA 94102
(415) 554-4700
Cityattorney@sfcityatty.org
Yvonne.Mere@sfcityatty.org
Mollie.Lee@sfcityatty.org
Sara.Eisenberg@sfcityatty.org
Ronald.Lee@sfcityatty.org
Alexander.Holtzman@sfcityatty.org

Attorneys for Plaintiff
City and County of San Francisco

OFFICE OF THE COUNTY COUNSEL,
COUNTY OF SANTA CLARA

/s/ Tony LoPresti

Tony LoPresti (CA Bar No. 289269)
County Counsel
Kavita Narayan (CA Bar No. 264191)
Chief Assistant County Counsel
Meredith A. Johnson (CA Bar No. 291018)
Lead Deputy County Counsel
Stefanie L. Wilson (CA Bar No. 314899)
Cara H. Sandberg (CA Bar No. 291058)
Deputy County Counsels
70 West Hedding Street
East Wing, 9th Floor

San José, CA 95110
(408) 299-9021
tony.lopresti@cco.sccgov.org
kavita.narayan@cco.sccgov.org
meredith.johnson@cco.sccgov.org
stefanie.wilson@cco.sccgov.org
cara.sandberg@cco.sccgov.org

Attorneys for Plaintiff County of Santa Clara

ADAM CEDERBAUM
Corporation Counsel, City of Boston

/s/ Samantha H. Fuchs
Samantha H. Fuchs (MA BBO No. 708216)
Senior Assistant Corporation Counsel
Samuel B. Dinning (MA BBO No. 704304)
Senior Assistant Corporation Counsel
One City Hall Square, Room 615
Boston, MA 02201
(617) 635-4034
samantha.fuchs@boston.gov
samuel.dinning@boston.gov

Attorneys for Plaintiff City of Boston

MURIEL GOODE-TRUFANT
Corporation Counsel of the City of New York

/s/ Doris Bernhardt
Doris Bernhardt (NY Bar No. 4449385)
Joshua P. Rubin (NY Bar No. 2734051)*
Aatif Iqbal (NY Bar No. 5068515)
Assistant Corporation Counsels
100 Church Street
New York, NY 10007
(212) 356-1000
dbernhar@law.nyc.gov
jrubin@law.nyc.gov
aiqbal@law.nyc.gov

Attorneys for Plaintiff City of New York

** Pro Hac Vice application pending*

CERTIFICATE OF SERVICE

I hereby certify that on May 20, 2025, I electronically filed the foregoing document with the Clerk of the United States District Court for the Western District of Washington via the CM/ECF system which will send notification of such filing to all parties who are entered in this matter and registered with the CM/ECF system.

DATED this 20th day of May, 2025.

/s/ Gabriela DeGregorio

Gabriela DeGregorio

Litigation Assistant

Pacifica Law Group LLP